

CLERK'S OFFICE U.S. DIST. COURT
AT HARRISONBURG, VA
FILED

UNITED STATES DISTRICT COURT

MAY 12 2015

JULIA C. DUDLEY, CLERK
BY: *[Signature]*
DEPUTY CLERK**SEALED**for the
Western District of VirginiaIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)INFORMATION ASSOCIATED WITH
ARTISTICOVERLAY@GMAIL.COM THAT IS STORED
AT PREMISES CONTROLLED BY THE GOOGLE CORCase No. 5:15mj00028

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

SEE ATTACHMENT A

located in the WESTERN District of VIRGINIA, there is now concealed (identify the person or describe the property to be seized):

SEE ATTACHMENT B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 USC 952(a)	Importation of controlled substance/analogue
21 USC 841(a)(1) and 846	Controlled substance/analogue offenses
18 USC 1956 and 1957	Money laundering offenses

The application is based on these facts:

SEE AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEARCH WARRANT, INCLUDED BY REFERENCE HEREIN

- ☒ Continued on the attached sheet.
- ☒ Delayed notice of days (give exact ending date if more than 30 days: 8-7-15) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

[Signature]

Applicant's signature

ROBERT E. L. SMITH, SPECIAL AGENT

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/12/2015*[Signature]*

Judge's signature

City and state: HARRISONBURG, VIRGINIA

HONORABLE JAMES G. WELSH, MAGISTRATE JUDGE

Printed name and title

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION

IN RE:

SEARCH OF INFORMATION *
ASSOCIATED WITH *
DSCHOLZ66@GMAIL.COM,
ARTISTICOVERLAY@GMAIL.COM, *
JWHWHOLESALE@GMAIL.COM,
MODERNDAYPROPHETBIZ@GMAIL.COM,
SUNNYERDAY@GMAIL.COM,
ROODTOWN@GMAIL.COM,
CLUTCH49@GMAIL.COM, *
FRIEDXXXMAN@GMAIL.COM, *
MATT4HOUSE@GMAIL.COM,
ITSBILL2588@GMAIL.COM and, *
JRTZRT@GMAIL.COM *
THAT IS STORED AT PREMISES *
CONTROLLED BY THE *
GOOGLE CORPORATION

CASE NO. 5:15mj00028

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Robert E. L. Smith, Special Agent of the Drug Enforcement Administration (DEA),
Winchester Resident Office (RO), being duly sworn, depose and state the following:

INTRODUCTION

1. I have been a duly sworn Special Agent (hereinafter SA) with the Drug Enforcement Administration (hereinafter DEA) having been so employed since June 2005. Prior to joining the DEA, I served as a Patrol Agent with the United States Border Patrol since June 2003. I am currently assigned to the Winchester RO of the Washington Field Division Office, located in Washington, D.C. During my employment in law enforcement, I have investigated and assisted in the investigation of numerous narcotics violators where narcotics have been purchased. I have

received training and experience in interviewing and interrogation techniques, arrest procedures, search warrant applications, surveillance, undercover operations, operations involving cooperating sources, and a variety of other investigative tools available to law enforcement officers. In the course of my training and experience, I have become familiar with the methods and techniques associated with the distribution of narcotics, the laundering of proceeds derived from the sale of narcotics, and the organization of drug conspiracies. In the course of conducting these investigations, I have been involved in the use of the following investigative techniques: interviewing witnesses and cooperating sources; conducting physical surveillance; consensual monitoring and recording of both telephonic and non-telephonic communications; analyzing telephone pen register and caller identification data; conducting court-authorized electronic surveillance; and preparing and executing search warrants which have led to substantial seizures of narcotics and other contraband.

2. I make this affidavit in support of an application for a search warrant for information associated with certain email accounts that are stored at premises controlled by the Google Corporation, an e-mail provider headquartered at 1600 Amphitheater Parkway, Mountain View, CA 94043. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require the Google Corporation to disclose to the government copies of the information (including the content of communications) further described in Section I of Attachment B. Upon receipt of the information described

in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

3. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter or all of the facts pertaining to this investigation.
4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that David SCHOLZ, Robert SCHROEDER, Chang LNU, Aaron HARLAND, William LANGLEY, Jess FRIEDMAN, Matthew RENICK, Bill DAVIS and James LNU and other conspirators, have used email accounts "DSCHOLZ66@GMAIL.COM", "ARTISTICOVERLAY@GMAIL.COM", "JWHWHOLESALE@GMAIL.COM", "MODERNDAYPROPHETBIZ@GMAIL.COM", "SUNNYERDAY@GMAIL.COM", "ROODTOWN@GMAIL.COM", "CLUTCH49@GMAIL.COM", "FRIEDXXXMAN@GMAIL.COM", "MATT4HOUSE@GMAIL.COM", "ITSBILL2588@GMAIL.COM", "JRTZRT@GMAIL.COM", in connection with possible violation(s) of Title 21, United States Code, Sections 841, 846 and 952(a) (controlled substance offenses); Title 18, United States Code, Sections 1956 and 1957 (money laundering offenses); and/or Title 18, United States Code, Section 2 (aiding and abetting the aforementioned offenses). There is also probable cause to search the information described in Attachment A for evidence and instrumentalities of these crimes further described in Attachment B.

JURISDICTION

5. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

BACKGROUND OF INVESTIGATION

6. The Drug Enforcement Administration (DEA) is investigating Robert SCHROEDER and his conspirators for criminal offenses related to controlled substances, controlled substance analogues and money laundering.
7. Thus far, law enforcement has conducted multiple controlled purchases of controlled substances or controlled substance analogues from SCHROEDER, using a confidential informant (CI). Law enforcement has recorded multiple telephone conversations between SCHROEDER and the CI relating to these controlled purchases. Law Enforcement has seized five narcotics/anologue packages connected to SCHROEDER in this investigation since the summer of 2013. Law Enforcement has executed multiple search warrants on various emails accounts associated with SCHROEDER and other conspirators.
8. On September 15, 2014, a 30-day Title III wiretap order was entered by Judge Ronald Guzman of the United States District Court for the Northern District of Illinois, which authorized the interception of wire and electronic communications occurring over cellular telephone number 630-768-9331 (hereinafter **Target Telephone 1**), which is utilized by SCHROEDER. Based in part on information

intercepted over **Target Telephone 1**, your Affiant was granted a search warrant for SCHROEDER's email address of ARTISTICOVERLAY@GMAIL.COM on September 25, 2014, by Magistrate Judge James G. Welsh, of the Western District of Virginia. On September 29, 2014, at approximately 2:51 pm, the search warrant was served electronically by DEA Science and Technology Internet Technology (STII) Unit on Google Cooperation. Based in part on the information obtained from that search warrant, your Affiant was granted additional search warrants for two of Deborah RYBA's suspected email addresses of DEBORAHRYBA@GMAIL.COM and DEBYRYBA@GMAIL.COM on February 10, 2015, by Magistrate Judge James G. Welsh, of the Western District of Virginia. On February 10, 2015, at approximately 3:20 pm, these search warrants were served electronically by DEA STII Unit on Google Cooperation.

9. SCHROEDER, Ryan BUCHANAN, David SCHOLZ, Brian LISTER, Nicholas PURINTUN, Deborah RYBA/BRADLEY, Jason BRADLEY, Matt BOYD and Diana BOYD/BROOKS, have been identified during the course of this investigation as suspected conspirators in the distribution of controlled substances, analogs of controlled substances and/or money laundering activities to conceal and/or use the proceeds derived from the distribution of controlled substances and/or analogs of controlled substances.
10. Of these suspected conspirators, SCHROEDER, BUCHANAN and SCHOLZ all had signature authority on two bank accounts for the business named Modern Day Prophet. The evidence suggests that Modern Day Prophet was a business-front used to distribute controlled substances, analogs of controlled substances and conduct

money laundering transactions. The investigation also includes statements provided by cooperating witnesses who have admitted to distributing large quantities (kilograms) of controlled substances/analog controlled substances (synthetic cathinones/cannabinoids) obtained from SCHROEDER and identified Modern Day Prophet as SCHROEDER's business front. One cooperating witness admitted to writing checks to SCHROEDER to pay for the synthetic cathinones, and your Affiant has identified three checks from the cooperating witness' business account deposited into Modern Day Prophet's checking account. These checks bare the signatures on the back for deposit which appear to match the signatures of SCHROEDER, BUCHANAN and SCHOLZ, as compared to their signatures on the Modern Day Prophet's authorized signature card as provided by JP Morgan Chase.

11. JP Morgan Chase banking records reveal deposits in excess of \$940,000 into Modern Day Prophet's primary checking account between September 2011 and September 2012. The account shows payments/withdrawals with several notations of "payroll" to SCHROEDER, BUCHANAN, SCHOLZ, LISTER and PURINTUN with total payments/withdrawals for each subject ranging between \$30,000 and \$127,000 (total in excess of \$375,000).
12. Between March and April 2012, Modern Day Prophet accounts wired a total of \$185,300 to the attention of Jason Edward BRADLEY to the China Construction Bank, in Hong Kong. Law enforcement suspects that BRADLEY is a conspirator of SCHROEDER'S. These wire transfers occurred on March 19th (\$40,000), 20th (\$50,000), 23rd (\$70,000), April 10th (\$10,300) and 27th (\$15,000) of 2012.
13. JP Morgan Chase Banking records reveal deposits in excess of \$700,000 into

Heavenly Site Shop's primary checking account between November 2011 and June 2012. Heavenly Site Shop was the name of a business operated by Diana BROOKS, and was identified in separate investigations for distributing controlled substances and/or analogs of controlled substances. Diana BROOKS had sole signature authority on Heavenly Site Shop's checking account, and the mailing address for Heavenly Site Shop is listed as 6212 US Highway 6 Ste 274, Portage, IN 46368. Between December 2011 and May 2012, 24 wire transfers totaling \$545,360 were sent to Jason BRADLEY at the China Construction Bank, in Hong Kong, from the Heavenly Site Shop's checking account.

14. Based on the information provided to DEA by Google Corporation for SCHROEDER's email account of ARTISTICOVERLAY@GMAIL.COM, your Affiant has identified one email from Jason@innovativesmoking.com, with an identification name as Jason BRADLEY, sent to SCHROEDER. The email from Jason@innovativesmoking.com occurred on October 19, 2011, and the content appears to be a screen-shot page image of banking information, which shows Jason BRADLEY as a recipient of finances and an address listed only as Hong Kong. The bank information in the email also shows a partial routing number, an account number, the bank name as "China Construction Bank (Asia) Corporation Limited", with an address of 518 Queens Road West, Sai Wan, Hong Kong. As noted above, China Construction Bank is the bank to which Modern Day Prophet wired \$185,300 and Heavenly Site Shop wired \$545,360 and wired to the attention of Jason BRADLEY.

15. BRADLEY and DEBORAH RYBA, who law enforcement believes may be

BRADLEY'S wife or girlfriend, departed the United States on August 24, 2011, to China, and returned to the United States from Hong Kong on June 8, 2012. This is the same time period when Modern Day Profit wired \$185,300 and Heavenly Site Shop wired \$545,360 to BRADLEY in Hong Kong, as described above. According to travel records, both BRADLEY and RYBA were not within the United States, when Jason@innovativesmoking.com sent the email to SCHROEDER and when the above referenced Modern Day Prophet and Heavenly Site Shop wire transfers occurred.

16. Based on training and experience, the investigation to date and conversation held with other law enforcement officers familiar with the distribution of synthetic cathinones/cannabinoids, your Affiant is aware that China is a primary source country in the world for synthetically manufactured controlled substances and analogs of controlled substances, and that Hong Kong is a conduit country used for forwarding shipments of such substances from China through various companies.
17. Also, between September 2011 and September 2012, financial records show that more than \$220,000 was transferred from a Modern Day Profit account to BRADLEY'S Bank of America account. These transfers occurred by cashier's checks and wire transfers. Some of the cashier's checks had annotation of "inventory" or "materials", and one wire transfer had an annotation of "Inventory for Electronic Cigarettes." Your Affiant reviewed the depository signatures on the back of the cashier's checks as provided by Bank of America for BRADLEY's account, and the signatures do not appear to match BRADLEY's signature as it appears on his Bank of America signature card. Rather, these signatures resemble the handwriting

of SCHROEDER, SCHOLZ or BUCHANAN. Your Affiant believes that Modern Day Prophet account users were making the deposits into BRADLEY's account and your Affiant supports this belief based on the fact that many of checks were deposited on the same day they were drafted. Your Affiant further supports this belief on the fact that the cashier's checks were drafted and deposited between November 15, 2011, and February 22, 2012, which is the same time frame that BRADLEY and RYBA were not in the United States according to travel records.

18. Law enforcement has investigated other companies and spoken with individuals that have dealt with Modern Day Profit, and have not encountered evidence that Modern Day Profit or SCHROEDER have dealt in electronic cigarettes. Your Affiant believes that the annotations on the wire transfer and/or cashier's checks referencing "Inventory" or "Materials" appear to misdirect banking personnel and law enforcement to the true nature of the deposits which your Affiant believes to have been for the purchase of controlled substances or analogs of controlled substances.
19. Your Affiant has reviewed other DEA cases related to the distribution of synthetic narcotics. During an investigation in Oregon, the cooperating witness identified his source of supply as "Diana" who was from "Indiana." Public, law enforcement and/or subpoenaed records demonstrate Diana BROOKS/BOYD resides in Indiana. An investigation in Wisconsin identified www.heavenlysoak.com as the website for the source that was contacted by a cooperating witness to obtain synthetic narcotics. The investigation obtained a sample product which tested positive for the presence of synthetic cathinones. The synthetic cathinone was mailed with a return address of Heavenly Soak, 6212 US Highway 6, Suite #274, Portage, Indiana 46368. This is

the same address that is utilized as the mailing address for the Heavenly Site Shop banking account of which Diana BROOKS had sole signature authority. An investigation in Arizona found that www.heavenlysoak.com was operated by Diana BROOKS and that Diana BROOKS was the source of supply of synthetic cathinones.

20. Your Affiant reviewed numerous emails provided by Google Corporation for the email addresses of DEBORAHRYBA@GMAIL.COM and DEBYRYBA@GMAIL.COM that discuss what your Affiant believes to be the obtaining, importation and distribution of synthetic narcotics. Your Affiant believes these email communications occurred between known and unknown suspected conspirators both foreign and domestic. Your Affiant supports these beliefs based on the communications referencing product names that are known to be synthetic cathinones/cannabinoids or analogs of synthetic cathinones/cannabinoids such as "JWH" or "MDPV" and that the manufacturer is based in China. Your Affiant further supports this belief as the email communications occur between known suspected conspirators such as David SCHOLZ (email-DSCHOLZ66@GMAIL.COM) and SCHROEDER's business entity Modern Day Prophet (email-MODERNDAYPROPHETBIZ@GMAIL.COM) or unknown conspirators looking to obtain synthetic narcotics such as Aaron HARLAND (email-ROODTOWN@GMAIL.COM). Your Affiant also observed what appeared to be both Deborah RYBA and Jason BRADLEY utilizing one or both of these email addresses as the emails are signed "Deborah" or "Jason".

DETAILS OF PROBABLE CAUSE

21. **DSCHOLZ66@GMAIL.COM** is the suspected email address of David SCHOLZ.

As mentioned above SCHOLZ had signature authority on the Modern Day Prophet checking account and was in receipt of payments in excess of \$83,000 from Modern Day Prophet's checking account between October 2011 and September 2012. These payments were primarily dispersed via a check or withdrawal to cashier's check from the Modern Day Prophet account and often had the annotation of "Payroll" documented on the check or withdrawal slip. Many of these checks were subsequently deposited in SCHOLZ's checking account to which SCHOLZ had sole signature authority.

22. In an email occurring on October 24, 2011, from "DSCHOLZ66@GMAIL.COM Dave Scholz" to "ARTISTICOVERLAY@GMAIL.COM" (email address used by Robert SCHROEDER) the subject line contains "lab test" and the content of the email was:

I need 2 Products tested; 1 is a synthetic cannabinoid I need to know that it does not contain, jwh-051, 018, 019, 073, 081, 091, 200, 220, 250 HU-210 and CP-47, 497. I also need to know what jwh is in it as well (if any). The second product I need tested is a synthetic stimulant; I need to know if it contains any of these chemicals: MDPV, M1, Mephadrone, 4-FMEC, and 3-FMEC? Also need to know what it is? How much product do I sent to test? What is the cost for both of these test? What is the turn time for these as well?

23. Based on the contents of this email communication, your Affiant believes that SCHOLZ and SCHROEDER are attempting to identify a new product of synthetic

narcotics to determine whether the product contains a chemical that is a scheduled substance. Your affiant is aware based on training and experience that individuals involved in the distribution of synthetic narcotics are able to continuously obtain chemical compounds that are not scheduled but, when consumed by humans, still provide the effects of the controlled substance. However, these substances often are determined to be analogs of controlled substances. Your Affiant supports this belief based on the fact that SCHOLZ identifies the products as “synthetic cannabinoid” and “synthetic stimulants,” which are also known as synthetic cathinones. Synthetic cathinones have the effects of cocaine and methamphetamine which are also known to act as stimulants when consumed by a person. Many of these substances that SCHOLZ identified in the email were analogs of a controlled substance when the email was sent or became scheduled controlled substances in the year 2011 prior to the email being sent. Further, some of these substances (i.e., MDPV and Mephadrone) became scheduled controlled substances on October 21, 2011, three days prior to the email being sent.

24. In an email occurring on October 14, 2011, from

“PRINT@MAGICGRAPHICSONLINE.COM” aka Magic Graphics (suspected user Laura Greenwald) to “DEBORAHRYBA@GMAIL.COM” (suspected user Deborah RYBA) with a subject line that contained “label art”, the content of the email contained “Here are the files for printing the packaging.” and an order for 10,000 “crystaal cleaner label.psd”. Attached to this email was a picture file that contained the artwork for the product crystal bubbly hookah cleaner, which was labeled as “crystal hookah cleaner label.psd”. This artwork is the same artwork design on the

packaging used to distribute synthetic cathinones seized by law enforcement officers and identified by cooperating witnesses as the product purchased from Robert SCHROEDER in multiple states, to include Harrisonburg, VA.

25. On December 11, 2011, Magic Graphics sent an email to RYBA and CC'd "DSCHOLZ66@GMAIL.COM" (suspected user David SCHOLZ), the subject line contained "artwork – packaging order" and the content of the email was:

Hi Debbie

Hope China is treating you well :)

Here's what they want...

5,000 delight

10,000 white stallion

Xxxxxx crystal bubbly

10,000 sweat leaf (front & back)

Please let me know if there is any confusion or problems with the files.

David wants you to have Jason call him about these.

Love and miss you!

Thank you!

-Laura

26. This email, which was carbon copied to DSCHOLZ66@GMAIL.COM, also contained multiple attachments of artwork which are consistent with packaging used to distribute of synthetic narcotics. The artwork also included designs for "Sweat Leaf" and "White Stallion." Your Affiant believes the order for "what they want" is a packaging order for Modern Day Prophet (which includes David SCHOLZ) so bulk narcotics can be repacked and redistributed. Your Affiant supports this belief based on the investigation which has revealed (documented above) that "crystal bubbly" is a product name of synthetic cathinone seized by law enforcement and

"Sweat Leaf" and "White Stallion" were documented in invoices from Modern Day Prophet seized by law enforcement. These seized invoices also listed "crystal bubbly", quantities and packaging sizes of 1 or ½ gram sizes.

27. In an email occurring on March 16, 2012, from Magic Graphics to RYBA the subject line contained "Modern Day" which your Affiant believes to be short for Modern Day Prophet. The contents of the email discuss "artwork for the new packaging" and order for "10,000" and attachments which include a design for "sweat leaf." Also referenced in the emails is a new order of "another 40,000" packages of crystal bubbly.

28. In an email occurring on October 30, 2012, from "Magic Graphics

<magicg@comcast.net>" the email was concluded with

Sincerely,
Laura Greenwald

Magic Graphics
Phone: (630) 729-0410
Fax: (630)729-7014

www.magicgraphicsonline.com

The email does not reference an email recipient; however, the email is part of an Email chain with Deborah RYBA.

29. Based on the information obtained during this investigation your Affiant is aware that **Target Telephone 1** (SCHROEDER) contacted Magic Graphics, telephone number (630) 729-0410, six times between February 18, 2012, and June 19, 2013. Your Affiant is also aware that Modern Day Prophet's checking account had multiple transactions with Magic Graphics. Your Affiant believes that Magic Graphics was used to develop product designs for packaging used to market and

distribute synthetic cathinones/cannabinoids or analogs of synthetic cathinones/cannabinoids for the business front Modern Day Prophet, which includes David SCHOLZ. Your Affiant supports this belief based on the design represented in an email attachment, as the same design on the synthetic cathinones that were seized by multiple law enforcement agencies, to include law enforcement in Harrisonburg, VA, as well as the financial transaction from Modern Day Prophet to Magic Graphics with the annotation on the checks as "Art Work". Your Affiant also believes that Laura Greenwald was acting as a conduit via Magic Graphics for communications between Modern Day Prophet, SCHOLZ and RYBA, as identified above in paragraph 28. Your Affiant supports this belief based on references to "Modern Day" (believed to be Modern Day Prophet), "crystaal bubbly" (a known synthetic cathinone) and DSCHOLZ66@GMAIL.COM being CC'd in the email that discuss suspected packaging orders and a request for Jason (suspected to be Jason BRADLEY) to call "David" (suspected to be David SCHOLZ) to discuss the order. Your Affiant is aware that emails and email addresses can be maintained for extended periods of time, even if the message was deleted or the address is no longer utilized. Your Affiant believes the address of DSCHOLZ66@GMAIL.COM has been utilized to import packaging material to further the conspiracy to distribute controlled substances and/or analogs of controlled substances within the United States, as well as other communications discussing the testing of product for the presence of controlled substances. Therefore, the email account associated with DSCHOLZ66@GMAIL.COM is likely to contain evidence of criminal violations associated with narcotics trafficking and/or money laundering.

30. **ARTISTICOVERLAY@GMAIL.COM** is the suspected email address of Robert SCHROEDER. As mentioned above, your Affiant was previously granted a search warrant for this email account on September 25, 2014. Upon reviewing email contents provided by Google Corporation pursuant to the search warrant, your Affiant found a suspected China-based company utilizing "YOUAREBESTTINA@GMAIL.COM". Your Affiant was granted a search warrant for YOUAREBESTTINA@GMAIL.COM email address on November 20, 2014, by Magistrate Judge James G. Welsh, of the Western District of Virginia. Through review of the contents of both these emails as provided by Google Corporation your Affiant found multiple orders or inquires to order synthetic narcotics by SCHROEDER to multiple sources, as well as email(s) related to the confirmation of payment. In addition, your Affiant found orders of synthetic narcotics from SCHROEDER to a China-based source of supply that were intercepted and subsequently seized at the Port of Entry by Customs and Border Protection. These seizures subsequently tested positive for the presence of a controlled substances (a-PVP). Communication about these seized shipments occurred between YOUAREBESTTINA@GMAIL.COM (suspected supplier) and ARTISTICOVERLAY@GMAIL.COM (Robert SCHROEDER). These seizures and email traffic occurred during the summer of 2014.

31. During November and December 2014, SCHROEDER held discussions with a cooperating witness, as directed by law enforcement, about receiving a shipment of synthetic narcotics and then forwarding the package of narcotics on to SCHROEDER in Illinois. SCHROEDER asked the cooperating witness to assist so

the package could clear Customs through New York City, thus avoiding Chicago Customs. SCHROEDER informed the cooperating witness that this product is not a synthetic cathinone but was more like LSD and warned the cooperating witness not to open the package as the substance could mess a person up for a couple days. Approximately four weeks later, on January 4, 2015, SCHROEDER alerted the cooperating witness that the package had arrived, meaning the package was at the law enforcement controlled P.O. Box in Harrisonburg, VA that SCHROEDER was provided. Your Affiant obtained this package which had a sender's address based in China. SCHROEDER was provided with a fictitious shipping label/tracking number to track the package via the Internet, to which SCHROEDER claimed later that he did track the package but never received it (NOTE: the package was seized by law enforcement and never sent). In return for this service, SCHROEDER was going to pay the cooperating witness with approximately 50-60 grams of synthetic cathinones.

32. Email communications occurred during the year 2014 between SCHROEDER and multiple China-based sources of supply of controlled substances/analogues in which SCHROEDER ordered or inquired about synthetic narcotics; he even inquired about shipments that were seized by Customs and Border Protection. Therefore, the email account associated with ARTISTICOVERLAY@GMAIL.COM is likely to contain evidence of criminal violations associated with narcotics trafficking and/or money laundering.
33. **JWHWHOLESALE@GMAIL.COM:** your affiant believes this email address is another address used by Robert SCHROEDER. As mentioned above, your Affiant

was granted a search warrant for SCHROEDER's email address of ARTISTICOVERLAY@GMAIL.COM on September 25, 2014. Upon reviewing the email contents provided by Google Corporation, pursuant to the search warrant, your Affiant found an email communication to JWHWHOLESALE@GMAIL.COM and ARTISTICOVERLAY@GMAIL.COM from "<Lillysleafnlog@hotmail.com> Lilly's Leaf N Log" with a subject line that contained "Just wonderin if you are still hangin in there?" The content of the email was:

Hey Robert,

It's Shandra from Lilly's in PA. I was cleaning up my emails and ran across some old ones from you and was just wonderin how you are doin? We have been going through some family tragedies here, so we have been out of communication for a couple months, and are just now finally getting things back in order. I tried to you after we sent your check, to make sure that got it, but I never got to talk to you. We are still hanging on to a couple of really good customers, and they have asked if we can get Crystaal Bubbly, I told them I would try my hardest to find some. If you still have any, we would be interested in getting some. Even if you don't have any or aren't in the biz anymore, I would love to hear from you. Hope your mom is doing well. If you want give me a call or shoot me an email.

Thanks Shandra
303-719-6321

34. Crystaal Bubbly, as referenced above, has been seized by law enforcement and tested. The chemical substances found within Crystaal Bubbly, Pentedrone, a-PVP and Pentylone, were analogues of controlled substances until March 7, 2014, when they became Schedule I controlled substances. Your Affiant believes that "Shandra" attempted to obtain synthetic cathinones from SCHROEDER. Your Affiant supports this belief based on the fact that "Shandra" specifically inquired about "Crystaal Bubbly" which your Affiant has detailed above is a synthetic cathinone that has been seized by law enforcement.

35. Your Affiant reviewed SCHROEDER's toll records and found that the phone number 303-719-6321, that "Shandra" listed at the bottom of the email, called **Target Telephone 1** (SCHROEDER) three times between March 4, 2013, and March 7, 2013, approximately one week prior to the email. All three calls lasted less than one minute which, based on training and experience, is consistent with calls that go un-answered. Your Affiant believes that "Shandra" followed up her unanswered calls with an email to the addresses she knew to have been used by SCHROEDER. Your Affiant searched the web for "Lilly's Leaf N Log" and found a complaint dated January 16, 2012, claiming Lilly's Leaf N Log from Frackville sells bath salts (aka synthetic cathinones). Your Affiant reviewed deposits into SCHROEDER's Bank of America accounts and found two checks dated May 6, 2011-\$500.00 and May 17, 2011-\$525.00 from Shandra L. Detweiler, 124 N. Second Street, Frackville, PA. A query into law enforcement databases revealed Shandra DETWEILER was charged on March 18, 2013, with a felony in violation of DRUG/DEV and Cosmetic Act by the Pennsylvania State Police. PA State Police stated that DETWEILER was investigated for distributing synthetic cathinones and is currently a fugitive from justice. PA State Police also show Crystaal Bubbly seized from DETWEILER but lab analysis not completed. Your Affiant is aware that emails and email addresses can be maintained for extended periods of time, even if the message was deleted or the address is no longer utilized. Additionally, the email address itself reveals "JWH" which is a prefix to many known synthetic cannabinoids such as JWH-018, JWH-073, JWH-200 that became scheduled controlled substances on March 1, 2011, and detailed in an above communication between SCHOLZ and SCHROEDER.

Therefore, the email account **JWHWHOLESALE@GMAIL.COM** is likely to contain evidence of criminal violations associated with narcotics trafficking and/or money laundering.

36. **MODERNDAYPROPHETBIZ@GMAIL.COM** an email address used by suspected conspirators affiliated with Modern Day Prophet. For example, in an email dated March 11, 2012, sent from "MODERNDAYPROPHETBIZ@GMAIL> Modern Day" to **DEBORAHRYBA@GMAIL.COM** the contents of the email was:

We don't actually have PO box's at the locations. They allow you to have packages deliver to their stores and you only have to pay \$5 per box so please be as close to actual names as possible. Sorry about the wait. Thanks.

Store # 2692 (513) 531-0100 Ryan Buchannan or Modern Day Prophet

Store # 2864 (513) 929-0090 Ryan, Chris Goldin, or Modern Day Prophet

Store # 4052 (513) 598-1888 Chris or Modern Day Prophet

Store # 5914 (614) 458-1126 Dave or Modern Day Prophet

Store # 1511 (614) 481-7877 Ryan or Modern Day Prophet

Store # 5888 (614) 586-1960 Bob Schroeder or Modern Day Prophet

Store # 2399 (937) 294-8008 Dave or Modern Day Prophet

Store # 3397 (937) 431-1882 Bob or Modern Day Prophet

Store # 2578 (937) 291-0505 Bob, Dave or Modern Day Prophet

Residence. Bob, Dave, Ryan, or Modern Day Prophet

37. **DEBORAHRYBA@GMAIL.COM** replied on March 11, 2012, and the content of that email was "The names will not even be close to your business name. Ill email you the names i use, but it wont be anything near your biz name. Everyone will be

different.” Based on training and experience this activity shows an effort to conceal and avoid the scope of their criminal conduct, the importation and subsequent distribution of controlled substances or analogs of controlled substances from law enforcement detection.

38. Based on the above email communications, your Affiant is also aware based on Internet research that the Store numbers referenced in the email above are UPS Stores and corresponding phone numbers. Your Affiant believes a conspirator affiliated with the business Modern Day Prophet was sending the UPS Store locations to which synthetic narcotics would be sent from an Asian location. Your affiant believes that Deborah RYBA would have been coordinating those shipments based on her email response to the list of UPS stores. Your affiant believes those shipments contained synthetic narcotics, and supports that belief based on the evidence gleaned from multiple investigations, to include this investigation, that shows that Modern Day Prophet was a source of supply of synthetic narcotics/analogues. Your affiant further believes that RYBA assisted with the shipment of the synthetic narcotics based on other emails (some referenced below) in which RYBA inquired with multiple suspected Chinese sources and discussed synthetic narcotics and sought guarantees that shipments from Asia would clear U.S. Customs.

39. Your affiant supports this belief with an email from DEBORAHRYBA@GMAIL.COM to Robert SCHROEDER at ARTISTICOVERLAY@GMAIL.COM which occurred on April 2, 2012 after the emails with MODERNDAYPROPHETBIZ@GMAIL.COM. The subject of this

email stated "Shipment via USPS – Today should arrive." The message of the email read as follows:

This is showing out of customs:

Dave or Robert
Online sporting and fitness shop
2312 far hills ave
ee618837011cn

These 2 have been in the US since march 31, so should be delivered Monday also:

ryan buccannan
6457 glenway ave
Ee618837008cn

robert s.
sporting good depot
2692 madison road
Ee618836991cn

40. Based on the above email, your Affiant believes that the

DEBORAHRYBA@GMAIL.COM email account again sent SCHROEDER an update on multiple incoming shipments of controlled substances or analogs of controlled substances. All three of these addresses are associated with UPS Stores; as previously stated, the use of UPS Stores is a method of operation of the SCHROEDER DTO. "2312 Far Hills Ave" is the address to UPS "Store # 2399", "6457 Glenway Ave" is the address to UPS "Store #4052" and "2692 Madison Road" is the address to UPS "Store #2692." Your affiant believes two different coconspirators or two different email addresses used by the same person communicated with RYBA to coordinate the importation of synthetic narcotics. Your affiant supports this belief based on the list of UPS Stores sent to RYBA from MODERNDAYPROPHETBIZ@GMAIL.COM and RYBA sent an update on

shipments into the United States to ARTISTICOVERLAY@GMAIL.COM. Your Affiant is aware, based on training and experience that narcotics traffickers will go to great lengths to conceal their activities and in this case the SCHROEDER DTO has utilized multiple physical addresses, email address, names and shipping methods to coordinate and to take receipt of the incoming packages of suspected controlled substances or analogs of controlled substances. Your Affiant believes the email address of DEBORAHRYBA@GMAIL.COM communicated with multiple email addresses affiliated with the SCHROEDER DTO, to include **MODERNDAYPROPHETBIZ@GMAIL.COM**, in order to facilitate the importation of controlled substances or analogs of controlled substances in support of the SCHROEDER DTO. Therefore, the email account **MODERNDAYPROPHETBIZ@GMAIL.COM** is likely to contain evidence of criminal violations associated with narcotics trafficking and/or money laundering.

41. **SUNNYERDAY@GMAIL.COM** the suspected email address of Sunny Chang.

Based on several email communications between SUNNYERDAY@GMAIL.COM and DEBORAHRYBA@GMAIL.COM your Affiant believes Chang is a person in China who assisted RYBA and BRADLEY with acquiring synthetics narcotics to import into the United States. Several email communications occurred between RYBA and Chang which discussed controlled substances or analogs of controlled substances and their prices per kilogram. One example occurred on May 4, 2011, when RYBA sent Chang an email and the subject lined contained "Please research this company... you called before and we both got pricing... but need to see if they are legit..." and the email stated:

Please research this company (they are not on Alibaba so I am not sure who or what they are):

Fengsheng chemical technology Co.

Then if they are legitimate.. call and see if we can get their pricing
Of the MDPV at 6450RMB/KG. (they said 9,000 at first)

Tel:86-025-66925050

Msn: blue20102010

QQ: 1762507530

Tell them your usual story to get the pricing down....

Then if the company checks out, get a sample sent ASAP. If they want to send methyllone and any other samples of new things he think we might like.

Make sure they have 1KG of MDPV on hand too.. cause we will order it the day we receive the sample if the sample is good.

Thank you

42. Based on the above email, your Affiant believes that RYBA is coordinating with Chang to obtain a new company to provide analog controlled substances. Both Methyllone and MDPV were controlled substance analogs at the time this email was sent and both became Scheduled I controlled substances on October 21, 2011. Your Affiant found that in 2011 the exchange rate of RMB (Renminbi-Currency of the Peoples Republic of China) to the United States Dollar was 6.46 RMB to \$1.00 and the price that RYBA was looking to pay for one kilogram of MDPV was approximately \$1,000.
43. On May 5, 2011, RYBA sent Chang an email with a subject line that contained "try this guy" and in the email RYBA provided Chang with another company and contact information. Chang responded "They told me that they are the trading company themselves, so the mini price for MDPV is RMB 8,000. Me is RMB 8500/kg. He said he has stock now for MDPV 20 kgs."

44. On May 14, 2011, RYBA sent Chang an email with a subject line of "samples needed from anyone u can get them from- along with pricing" and the email was:

1. MDAI
2. MXE – methoxetamine
3. 4-mec 9we alrady got from qing dao guy so dont ask him again)
4. JWH-250
5. NRG-1 or NRG-2

This is something I am not sure if you can find or maybe its illegal.. i dont know (ask one person and we should have our answer if they have it or not)

3-MEO-pcp
4-meo-pcp

Thanks!

On May 17, 2011, Chang responded to RYBA with:

methoxetamine 26000/kg
JWH250 13000/kg
nrg-1 6500/kg
mdai 23000/kg
From Qingdao guy, other they don't have.
He will send 1 g sample for the above ones he had this afternoon.

Based on the information discussed in the above emails your affiant believes RYBA discussed controlled substances or analogs of controlled substances. Methoxetamine, for example, is an analogue of the controlled substance PCE, which has been a Scheduled I controlled substances since 1978. Additionally, JWH250 became a Scheduled I controlled substance on July 9, 2012 and was an analogue of a controlled substance prior to that date. Your Affiant believes the email address of DEBORAHRYBA@GMAIL.COM communicated with SUNNYERDAY@GMAIL.COM, to identify suppliers of controlled substances or, andthe email account SUNNYERDAY@GMAIL.COM , therefore, is likely to

contain evidence of criminal violations associated with narcotics trafficking and/or money laundering

Probable Cause Related to HeavenlyChem.Com Purchase Inquiries

45. The following six email addresses, discussed in the below paragraphs, all appear to have sent inquiries to a website that were re-directed to RYBA's email address of "DEBYRYBA@GMAIL.COM". Your Affiant is aware that when synthetic narcotics became prevalent in the United States distributors set up web pages so a person can search the Internet to inquire about the availability of products as well as establish a line of communication to purchase these products. Your Affiant is aware that web pages create layers of ambiguity so that the purchaser is not directly contacting the seller. The message is sent to the web page, rerouted to an email address and the person who reads the message can then choose the method to contact the purchaser, such as using a secondary email, a secondary person, telephonically contact the purchaser or sending the product (i.e. a sample) without responding to the inquiry. This ultimately creates several layers to hide the true nature of the communication, sending the funds for the purchase or the actual shipping of the synthetic narcotics. Your Affiant supports this belief based a review of DEBYRYBA@GMAIL.COM account which revealed no email responses to the inquiries sent to DEBYRYBA@GMAIL.COM. Additionally, your Affiant found a communication between RYBA and another suspected conspirator, Matt BOYD, which discussed these inquiries. In the email RYBA asks BOYD if he "see these messages that pop up..." "Adam Chambers sent in a message with his order...". BOYD responded "No I don't get messages from inquiries@heavenly forwarded

from her. Wait cig or heaven?" RYBA responded "Heaven Like when someone creates an order they have the option to put some notes in.... This guy did and asked for samples of other products, didn't know if u saw it or not... I just happened to see it when fixing things." Your Affiant also found an email to RYBA for the HeavenlyChem.com purchase inquiry from "Adam Chambers."

46. Your Affiant further supports this belief based on the Wisconsin investigation, referenced above, where the cooperating witness made a request to the website called HeavenlySoak.com. The Arizona investigation, referenced above, found HeavenlySoak.com affiliated to Diana BROOKS (the suspected mother of Matt BOYD). Your Affiant also found email communication in RYBA's email between RYBA and BRADLEY discussing the subjects of "About Us" and "FAQ and terms" in regards to HeavenlySoak.com web page. In another email RYBA claimed to have experience with establishing web pages. Your Affiant did not find an active web page for HeavenlyChem.com or HeavenlySoak.com and believes the web pages were removed. Your Affiant believes that HeavenlyChem.com and HeavenlySoak.com were established, maintained and/or operated by RYBA, BRADLEY, BROOKS and/or BOYD for the purpose of advertising and distributing controlled substances or analogs of controlled substances.

47. Your Affiant believes a search of the email address, detailed below, that inquired into purchasing analogs of controlled substances may reveal the responses provided by RYBA or other coconspirators to those inquiries, as well as identify conspirators who were/are involved with the distribution of controlled substances or analogs of controlled substances. Your Affiant believes there will be reply emails to the

inquiries sent from the below-listed email addresses because email responses would maintain a level of secrecy for the distributor(s) versus a telephone call.

48. **ROODTOWN@GMAIL.COM** sent an inquiry on February 7, 2012, which provided this email address and a contact name of Aaron HARLAND. The content of the message was "hello...I'm interested in alpha pvp...I've tried it from several sources and the only place that had a great product is no longer in service...It is my wifes birthday this weekend so I'm hoping to purchase an order today so it can arrive by the weekend...The last order I had to flush due to additives which caused nausiousnees...".
49. **CLUTCH49@GMAIL.COM** sent an inquiry on May 5, 2012, which provided this email address and a contact name of William LANGLEY. The content of the message was "Looking to purchase 100g or more lots of A-pvp, needing price list for said weight".
50. **FRIEDXXXMAN@GMAIL.COM** sent an inquiry on May 14, 2012, which provided this email address and a contact name of Jess FRIEDMAN. The content of the message was "Will you send me a sample of mxe? I am looking for a vendor since my old UK vendor was shut down. I live in the USA."
51. **MATT4HOUSE@GMAIL.COM** sent an inquiry on June 27, 2012, which provided this email address and a contact name of Matthew RENICK. The content of the message was "Hi interested in buying 4-fa and mdai and maybe a pvp.. what are the prices per gram from 1-20 of each.. shipping costs where its shipped from and preffered method of payment.. 'thanks'".

52. **ITSBILL2588@GMAIL.COM** sent an inquiry on October 3, 2012, which provided this email address and a contact name of Bill DAVIS. The content of the message was "hi what is the min order and cost of a-pvp".
53. **JRTZRT@GMAIL.COM** sent an inquiry on October 4, 2012, which provided this email address and a contact name of James. The content of the message was "I would like to know the min amout I need to order and prices for A-pvp."
54. Your Affiant is aware, based on training and experience, that alpha-PVP, as referenced in five of the six inquires above became, a Scheduled I controlled substance on March 7, 2014. During the time these five emails were sent, alpha-PVP/a-PVP was an analog of the controlled substance MDPV. MDPV became a controlled substance on October 21, 2011. Your Affiant is also aware the substance MXE, inquired in the sixth email, is an analog of the Scheduled I hallucinogen PCE, which was scheduled on October 25, 1978.
55. Affiant is aware that emails and email addresses can be maintained for extended periods of time, even if the message was deleted or the address is no longer utilized. Your Affiant believes the addresses of **ROODTOWN@GMAIL.COM**, **CLUTCH49@GMAIL.COM**, **FRIEDXXXMAN@GMAIL.COM**, **MATT4HOUSE@GMAIL.COM**, **ITSBILL2588@GMAIL.COM**, **JRTZRT@GMAIL.COM**, have been utilized to aid in the distribution of controlled substances and/or analogs of controlled substances within the United States. Therefore, the email accounts associated with **ROODTOWN@GMAIL.COM**, **CLUTCH49@GMAIL.COM**, **FRIEDXXXMAN@GMAIL.COM**,

MATT4HOUSE@GMAIL.COM, ITSBILL2588@GMAIL.COM,

JRTZRT@GMAIL.COM are likely to contain evidence of criminal violations associated with narcotics trafficking and/or money laundering.

56. A preservation request has been sent to the Gmail domain name service provider, the Google Corporation, for these e-mail addresses. In general, an e-mail that is sent to a Gmail account subscriber is stored in the subscriber's "mail box" on the Google Corporation servers until the subscriber deletes the e-mail. Therefore, if the subscriber does not delete the message, that message can remain on the Google Corporation servers indefinitely. Even if the subscriber deletes the e-mail, it may continue to be available on the Google Corporation's servers for a certain period of time.

BACKGROUND CONCERNING E-MAIL

57. Your Affiant has learned that the Google Corporation is located in the United States and provides a variety of on-line services, including electronic mail ("e-mail") access, to the public. The Google Corporation allows subscribers to obtain e-mail accounts at the domain name gmail.com, like the e-mail account listed in Attachment A. Subscribers obtain an account by registering with the Google Corporation. During the registration process, the Google Corporation asks subscribers to provide basic personal information. Therefore, the computers of the Google Corporation are likely to contain stored electronic communications (including retrieved and unretrieved e-mail for Google Corporation subscribers) and information concerning subscribers and their use of the Google Corporation services, such as account access information, e-mail transaction information, and account application information. In

my training and experience, such information may constitute evidence of the crimes under investigation through their substance or because the information can be used to identify the account's user or users.

58. Your Affiant is aware that Gmail subscribers can also store with the provider files in addition to e-mails, such as address books, contact or buddy lists, calendar data, pictures (other than ones attached to e-mails), and other files, on servers maintained and/or owned by the Google Corporation. In my training and experience, evidence of who was using an e-mail account may be found in address books, contact or buddy lists, e-mail in the account, and attachments to e-mails, including pictures and files.

59. Based on training and experience, your Affiant is aware that e-mail providers generally ask their subscribers to provide certain personal identifying information when registering for an e-mail account. Such information can include the subscriber's full name, physical address, telephone numbers and other identifiers, alternative e-mail addresses, and, for paying subscribers, means and source of payment (including any credit or bank account number). Such information may constitute evidence of the crimes under investigation because the information can be used to identify the account's user or users.

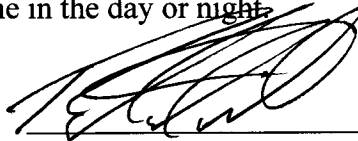
60. Your Affiant is aware that e-mail providers typically retain certain transactional information about the creation and use of each account on their systems. This information can include the date on which the account was created, the length of service, records of log-in (i.e., session) times and durations, the types of service utilized, the status of the account (including whether the account is inactive or

closed), the methods used to connect to the account (such as logging into the account via the provider's website), and other log files that reflect usage of the account. In addition, e-mail providers often have records of the Internet Protocol address ("IP address") used to register the account and the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access the e-mail account.

61. Your Affiant is aware that e-mail account users will communicate directly with an e-mail service provider about issues relating to the account, such as technical problems, billing inquiries, or complaints from other users. E-mail providers typically retain records about such communications, including records of contacts between the user and the provider's support services, as well records of any actions taken by the provider or user as a result of the communications. Based on training and experience, such information may constitute evidence of the crimes under investigation because the information can be used to identify the account's user or users.
62. Your affiant requests delayed notification until August 7, 2015 (or until otherwise ordered by this Court) to the subscribers the email accounts listed above. This delayed notification is necessary to avoid disrupting and disclosing the investigation, which remains covert at this time. Notification to these subscribers will reveal the existence of the investigation to subjects of the investigation, and could cause them and others to destroy or conceal evidence, and conceal or transfer forfeitable assets. Notification could also endanger the safety of officers and confidential informants.

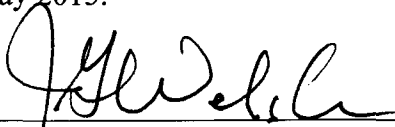
CONCLUSION

63. Based on the information above, your Affiant requests that the Court issue the proposed search warrants of email accounts DSCHOLZ66@GMAIL.COM, ARTISTICOVERLAY@GMAIL.COM, JWHWHOLESALE@GMAIL.COM, MODERNDAYPROPHETBIZ@GMAIL.COM, SUNNYERDAY@GMAIL.COM, ROODTOWN@GMAIL.COM, CLUTCH49@GMAIL.COM, FRIEDXXXMAN@GMAIL.COM, MATT4HOUSE@GMAIL.COM, ITSBILL2588@GMAIL.COM, and JRTZRT@GMAIL.COM. Because the warrants will be served on the Google Corporation, which will then compile the requested records at a time convenient to it, there exists reasonable cause to permit the execution of the warrant at any time in the day or night.



Robert E. L. Smith
Special Agent
United States
Drug Enforcement Administration

Sworn and subscribed to me this 5-12-2015 day
of May 2015.



The Honorable James G. Welsh
United States Magistrate Judge
Harrisonburg, Virginia

ATTACHMENT A - PROPERTY TO BE SEARCHED

This search warrant applies to all information associated with the following eleven e-mail addresses that are stored at premises controlled by the Google Corporation, a company that accepts service of legal process at 1600 Amphitheater Parkway, Mountain View, CA 94043:

DSCHOLZ66@GMAIL.COM,
ARTISTICOVERLAY@GMAIL.COM,
JWHWHOLESALE@GMAIL.COM,
MODERNDAYPROPHETBIZ@GMAIL.COM,
SUNNYERDAY@GMAIL.COM,
ROODTOWN@GMAIL.COM,
CLUTCH49@GMAIL.COM,
FRIEDXXXMAN@GMAIL.COM,
MATT4HOUSE@GMAIL.COM,
ITSBILL2588@GMAIL.COM and,
JRTZRT@GMAIL.COM

ATTACHMENT B - ITEMS TO BE SEIZED

I. Information to be disclosed by the Google Corporation (the "Provider")

To the extent that the information described in Attachment A is within the possession, custody, or control of the Provider, including any emails, email attachments, records, files, logs, or information that has been deleted but is still available to the Provider, or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f) on March 27, 2015, for DSCHOLZ66@GMAIL.COM, ARTISTICOVERLAY@GMAIL.COM, JWHWHOLESALE@GMAIL.COM, MODERNDAYPROPHETBIZ@GMAIL.COM, SUNNYERDAY@GMAIL.COM, ROODTOWN@GMAIL.COM, CLUTCH49@GMAIL.COM, FRIEDXXXMAN@GMAIL.COM, MATT4HOUSE@GMAIL.COM, ITSBILL2588@GMAIL.COM, and JRTZRT@GMAIL.COM, the Provider is required to disclose the following information to the government for each email account or identifier listed in Attachment A:

a. The contents of all e-mails associated with the account, including stored or preserved copies of e-mails sent to and from the account, attachments, draft e-mails, the source and destination addresses associated with each e-mail, the date and time at which each e-mail was sent, and the size and length of each e-mail;

b. All records or other information regarding the identification of the account, to include full name, physical address, telephone numbers and other identifiers, records of session times and durations, the date on which the account was created, the length of service, the IP address used to register the account, log-in IP addresses associated with session times and dates, account status, alternative e-mail addresses provided during registration, methods of connecting, log files, and means and source of payment (including any credit or bank account number);

- c. The types of service utilized;
- d. All records or other information stored at any time by an individual using the account, including address books, contact and buddy lists, calendar data, pictures, and files; and
- e. All records pertaining to communications between the Provider and any person regarding the account, including contacts with support services and records of actions taken.

II. Information to be seized by the government

All information described above in Section I that constitutes evidence or instrumentalities of violations of the statutes cited above, those violations involving Deborah Ryba, Jason Bradly, David Scholz, Robert Schroeder, Sunny Chang, Aaron Harland, William Langley, Jess Friedman, Matthew Renick, Bill Davis and other known and unknown conspirators, including, for each email account or identifier listed on Attachment A, information pertaining to the following matters:

a. All information pertaining to the importation, distribution, possession or manufacturing of controlled substances or analogues of controlled substances to include, but not limited to, shipping records, invoices, transaction receipts/orders, payment methods, tracking logs or conduct in furtherance of controlled substance/analogue violations. All information pertaining to methods of money laundering and financial activities to include, but not limited to, banking activities, wire transfers, bank notifications, real estate transactions, sports betting/gambling, lines of credit, pre-paid bank cards, credit/debit cards, stock market trading, movement or distribution of financial monies, insurance payments, acquiring items of value such as jewelry or precious stones or any other methods of operation to conceal illegitimate source of income, such as the establishment or use of business fronts, legitimate or otherwise, or the payments of taxes, fees, or registrations of business fronts. All information related to controlled substance/analogue violations or money laundering activities such as travel records and related information, obtaining identifications or communication devices, shipping information, communications between or among other associates, partners or co-conspirators to included their identities and whereabouts, or the establishing accounts or online profiles in furtherance of said activities.